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REMARKS

Applicants respectfully request reconsideration of the application identified above. Claims 1, 3-4, 6-10, 13-17, 20, 22-23, 26-28 and 30-32 are pending; and claims 1, 3-4, 6-8, 13-17, and 22-23 are amended. Applicants respectfully traverse the rejections as conceivably applied to the pending claims.

I. Rejections Under 35 U.S.C. §112, First Paragraph

Claims 1-22 were rejected under 35 U.S.C. §112, First Paragraph as failing to comply with the written description requirement. These claims have been amended to address the First Paragraph rejection; and it is respectfully submitted that this rejection should be withdrawn.

II. Rejections Based on the Arrowsmith Patent in View of the Arrowsmith Publication, in Further View of Schneeberger and Mosier

As previously presented, claims 1, 6-10, 13-15, 20, 23, 26-28 and 32 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 4,624,752 to Arrowsmith et al (the "Arrowsmith Patent") in view of Arrowsmith's article, "The enhancement of adhesive joint strength by extending the surface of anodized aluminum," (the "Arrowsmith Publication") and further in view of U.S. Patent 4,235,682 to Schneeberger et al and U.S. Patent 3,671,333 to Mosier.

First, neither the references cited in the Office Action, nor any other evidence of record, establish a *prima facie* case of obviousness. Filed herewith is a 37 C.F.R. §1.132 Declaration of James Nalewick, an expert in the field of aluminum processing. The facts set

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forth in Mr. Nalewick's Declaration establish the following with regard to the respective references: (a) the combination of references proposed in the Office Action would render the references inoperable for their intended purposes; (b) the combination of references proposed in the Office Action would have changed the principles of operation of the processes and techniques shown in the references; and/or (c) there was no motivation or suggestion in the art, as of the filing date of the present application that would have prompted one of ordinary skill in the art to make the combination of references.

Second, even if the references were hypothetically combined, with regard to the amended claims, the references do not disclose, teach or suggest: (a) anodizing a continuous, unanodized aluminum web to create an anodic layer on each first and second sides, sealing the anodic layer, and advancing the web over a roller, the roller at least partially submersed in a composition comprising sodium hydroxide, wherein the roller transfers the composition to the first side to selectively etch that side, but not the second side, wherein the composition dissolves a first portion of the anodic layer on the first side and thereby roughens a remaining portion of the anodic layer, and wherein the second side remains undissolved by the composition (claim 1); (b) anodizing an aluminum article to produce first and second surfaces each including an anodic layer, sealing the anodic layer, advancing the aluminum article over a roller so that the roller contacts the aluminum article and so that an etching composition comprising sodium hydroxide is applied from the roller to the first surface, and preventing the etching composition from etching the second surface of the article by maintaining the second surface out of contact from a roller (claim 13); or (c) anodizing an aluminum sheet or web to produce a first anodized surface

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and a second anodized surface including anodic layers, sealing the anodic layer, advancing the aluminum sheet or web over a roller so that the roller contacts the sheet or web, the roller at least partially submerged in a caustic solution comprising sodium hydroxide and administering the caustic solution to the first anodized surface with a roller--but not the second anodized surface--to create an adhesion surface, wherein the aluminum sheet or web remains unsubmerged in the caustic solution so the caustic solution cannot contact the second anodized surface. Instead, the cited references disclose piece-part processing of all surfaces a dipped part. See for example, Arrowsmith, Col. 1, Lns. 61-64; Col. 3, Lns. 45-48. Moreover, none of the references even contemplate advancing a continuous sheet or web over a roller to apply an etching solution--let alone the roller and submersion features recited in the respective amended independent claims.

Claims 6-10; 14-15, 20; 26-28 and 32 depend from amended independent claims 1, 13 and 23, respectively, and are therefore allowable for at least the reasons noted above in connection with those claims. In addition, claim 6 recites coloring the first side and the second side before said advancing step. Claim 8 recites sealing before advancing. Claim 7 recites a bonding layer of about 4-10 nanometers in depth. Claim 8 recites sealing before advancing the web. Claim 9 recites the etching composition is sodium hydroxide of about 0.1 to about 0.5 molar, and claim 10 recites exposure of about 20 to about 60 seconds. Claim 14 recites coloring before advancing. Claim 15 recites the roller is partially submerged in the composition during the advancing step. Claim 20 recites that the aluminum article is a structure selected from a web and a sheet. Claims 26-28 recite a specific parameters during the administering step. Claim 32 recites exposure time to the caustic solution.

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III. Rejections Based on the Arrowsmith Patent in View of the Arrowsmith Publication, in Further View of Schneeberger and Mosier, in Further View of Additional References

As previously presented, claims 3, 4, 16, 17, 22, 30 and 31 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Arrowsmith Patent in view of the Arrowsmith Publication in further view of Schneeberger and Mosier in further view of: U.S. Patent 3,898,095 to Berdan (claims 3 and 30); U.S. Patent 4,124,437 to Bond (claims 4 and 16); U.S. Patent 4,013,498 to Frantzen (claims 17 and 31); Berdan in further view of Bond (claim 22). The rejection of these claims is addressed below.

A. Claims 3 and 30

Claims 3 and 30 depend from amended independent claims 1 and 23, respectively, and are therefore allowable for at least the reasons noted above in connection with those claims. In addition, dependent claim 3 recites a web that remains unsubmerged in the composition as the web is advanced over the roller. None of the references, including Berdan, disclose, teach or suggest this feature.

With regard to claim 30, the additional reference, Berdan, fails to make up for the deficiencies of the other applied references as disclosed above in connection with amended independent claim 23. In addition to the deficiencies noted above in connection with the independent claims, Berdan fails to disclose, teach or suggest a roller advancing an aluminum sheet or web over a roller so that a caustic solution is administered to a first anodized surface but not a second anodized surface with the roller, or wherein the aluminum sheet or web remains

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unsubmerged in the caustic solution so the caustic solution cannot contact the second anodized surface, as recited in amended independent claim 23 from which claim 30 depends.

B. Claims 4 and 16

Claims 4 and 16 depend from amended independent claims 1 and 13, respectively, and are therefore allowable for at least the reasons noted above in connection with those claims. In addition, claim 4 recites that substantially only a first side of a web contact by roller as the composition is transferred from the roller to the first side. Amended dependent claim 16 recites that the article is unsubmerged in the etching composition during the advancing step. Bond fails to make up for the deficiencies of the other references.

C. Claims 17 and 31

Claims 17 and 31 depend from amended independent claims 13 and 23, respectively, and are therefore allowable for at least the reasons noted above in connection with those claims. In addition, claim 17 now recites that the second side of the aluminum article remains uncontacted by the etching composition during an advancing step over a roller. Frantzen fails to make up for the deficiencies of the other cited references, and fails to disclose, teach or suggest such a feature.

With regard to claim 31, Frantzen also fails to disclose, teach or suggest the caustic solution being prevented from contacting a second anodized surface by positioning the shield adjacent a second anodized surface as the caustic solution is applied to the first anodized surface. Indeed, the etchant of Frantzen necessarily contacts the second side because the etchant chemically bores holes completely through the material--i.e., through the first side and through

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the second side. Col. 1, Lns. 61-65; Col. 3, Lns. 34-39. Thus, the caustic solution of Frantzen is *not* prevented from contacting the second anodized surface via the shield as recited in claim 31.

D. Claim 22

Claim 22 depends from amended independent claim 13 and is therefore allowable for at least the reasons noted above in connection with that claim. In addition, claim 22 recites that after the advancing step, the first side has the property of cohesive bond failure at about 30 to about 60 pounds per square inch in a tensile pull tester operating with a crosshead speed of 10 inches per minute, and the second side includes a decorative finish. Bond in no way makes up for the deficiencies of the other references in failing to disclose, teach or suggest this feature.

CONCLUSION

In view of the above Amendments and Remarks, it is respectfully submitted that the present application is in condition for allowance. A notice to that effect is earnestly and respectfully requested.

Respectfully submitted,

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